Amendments to the Drawings

Eleven replacement sheets of drawings are attached which include changes to Figs. 1, 2, and 7-14. These sheets replace the original drawings for Figs. 1, 2, and 7-14.

Attachments: 11 Replacement Sheets

REMARKS/ARGUMENTS

Applicants respectfully request further examination and reconsideration in view of the arguments set forth fully below. Claims 111, 112, and 114-119 were previously pending in this application. Claims 111, 112, and 114-119 have been rejected. By the above amendments, Claims 111, 114, and 115-119 have been amended, and Claim 112 has been canceled. Accordingly, Claims 111 and 114-119 are now pending in this application.

Drawings

The Office Action states that Figs. 1, 2, and 7-14 are objected to because the elements or boxes in each of the figures have no labels that allow a viewer to understand the figures without substantial analysis of the detailed specification. Tables identifying each of the elements have been included within each figure.

In addition, reference to elements 156, 158, 160, and 162 have been removed from Fig. 2, element 472 has been removed from Fig. 10, and elements 1018 and 1092 have been removed from Fig. 14.

Claim Objections

Within the Office Action, claims 111 and 117-119 are objected to because it is unclear what the phrase "each selected output device" refers to. Claims 111 and 117-119 have been amended accordingly.

Within the Office Action, claims 114 is objected to because the word "and" should be written as "or." Claims 114 has been amended accordingly.

Claim Rejections under 35 U.S.C. § 112

Within the Office Action, claims 112 and 116 are objected to for using "comprising" in a Markush-style claim. Claims 112 has been canceled, and claim 116 has been amended accordingly.

Claim Rejections under 35 U.S.C. § 101

Within the Office Action, claims 117 and 119 have been rejected under 35 U.S.C. § 101 because the language of the claim raises a question as to whether the

claim is directed merely to an abstract idea that is not tied to a technological art, environment or machine. Claims 117 and 119 have been amended accordingly.

Rejections under 35 U.S.C. § 103

Within the Office Action, Claims 111, 112, and 116-119 have been rejected under 35 U.S.C. § 103(a) as being anticipated by U.S. Patent No. 6,336,124 to Alam et al. (hereinafter "Alam"), Claim 114 has been rejected under 35 U.S.C. § 103(a) as being anticipated by Alam in view of U.S. Patent No. 6,616,700 to Thum et al. (hereinafter "Thum") and further in view of U.S. Patent No. 6,775,678 to Hillberg et al. (hereinafter "Hillberg"), and Claim 115 has been rejected under 35 U.S.C. § 103(a) as being anticipated by Alam in view of Thum and further in view of U.S. Patent No. 6,104,798 to Lickiss et al. (hereinafter "Lickiss"). The applicants respectfully disagree with these rejections.

Alam teaches a method of converting a document image stored in one format into other formats for manipulation and display. Alam's method locates data in the input document, groups data into one or more intermediate format blocks in an intermediate format document, and converts the intermediate format doecument to the output format document using the intermediate format blocks. Alam teaches the breakedown of only text and impage files by locating words in the input document, joining words satisfying a line threshold into lines, joining lines satisfying a paragraph threshold into parpgraphs, locating tables, and locating tags or control characters in the input document. [Alam, col. 2, lines 14-25]

Alam does not teach a method for converting all types of multimedia input files into multiple target formats. In particular, Alam doesn't teach the decomposition of files containing animation or sounds, only image and text files. Alam teaches only that "the intermediate and output format document preferably *retains* any embedded animation, sounds and/or music, as well as the execution of links to start up other applications." [Alam, col. 21, lines 14-17] Thus, if the executables contained in the original input document is supported or executable by the output device, the executable is merely retained rather than decomposed into primitives, otherwise the executable is removed to avoid error messages. [Alam, col, 21, lines 17-25]

Thum teaches a method for converting video into multiple markup language targeted to different devices, wherein the video content is re-purposed for presentation catering to various devices having widely differing audio and visual/text display capabilities and different bandwidth requirements. [Thum, col.3, line 67 – col. 4, line 3] Thum does not teach the automatic breakdown of the input digital file into primitives and sub-components and the subsequent conversion of the sub-components into intermediate format components. Thum teaches only the ranking and selection of images based on a user supplied significance measure. [Thum, col. 4, lines 46-50]

In contrast to both Alam and Thum, the present invention requires that the conversion method be capable of automatically converting all types of digital media files which contain coded information that deliver sound, text, graphs, or video that *contains more than mere text or numerical manipulations*. [Specification, paragraph 0031] The present invention teaches that a multi-media digital input file is automatically examined and broken down into picture primitives, test primitives, animation primitives, graphics primitives, video primitives, and supporting material primitives, and each of these primitives are then automatically broken down into their respective components. [Specification, paragraph 0075]

Because neither Alam nor Thum provide for the automatic breakdown of multi-media input files into all types of primitives including picture, test, animation, graphics, video, and supporting material primitives and their respective components, no combination of the references can result in a teaching for automatically identifying multi-media type primitive components and then decomposing the primitive components into sub-components. Thus, the claimed invention cannot be obvious in view of these references or any combination thereof.

Also, Claim 111 integrates the multi-media type primitive components from several multi-media files into a single output file. In constrast, Alam merely discloses converting a *single* text or bitmapped input file [Alam, abstract], while Thum merely discloses converting a *single* input video file [Thum, abstract].

The amended independent Claim 111 is directed to a method comprising receiving one or more input multi-media content files, *automatically identifying multi-media type primitive components in each of said plurality of input multi-media files, wherein the multi-media type primitives include audio primitives, video primitives,*

animation primitives, text primitives, picture primitives, graphic primitives, and supporting material primitives, automatically decomposing each of said multi-media type primitive components into sub-components, and automatically converting each of said sub-components into corresponding intermediate format components. As discussed above, neither Alam nor Thum teaches automatically breaking down a multi-media input file into all of its primitives and sub-components before integrating the sub-components into an intermediate format file. For at least these reasons, the independent Claim 111 is allowable over the teachings of Alam, Thum, and any combination thereof.

Claim 116 is dependent on the independent Claim 111. As described above, the independent Claim 111 is allowable over the teachings of Alam, Thum, and any combination thereof. Accordingly, Claim 116 is also allowable as being dependent on an allowable claim. This claim adds limitations further distinguishing over the cited art.

The amended independent Claim 117 is directed to a system comprising a transformation module for *automatically identifying multi-media type primitive components in each of said plurality of input multi-media files, wherein the multi-media type primitives include audio primitives, video primitives, animation primitives, text primitives, picture primitives, graphic primitives, and supporting material primitives,* automatically decomposing each of said multi-media type primitive components into sub-components, and automatically converting each of said sub-components into corresponding intermediate format components. As discussed above, neither Alam nor Thum teaches automatically breaking down a multi-media input file into all of its primitives and sub-components before integrating the sub-components into an intermediate format file. For at least these reasons, the independent Claim 117 is allowable over the teachings of Alam, Thum, and any combination thereof.

The amended independent Claim 118 is directed toward a method comprising *automatically identifying multi-media type primitive components in each of said plurality of input multi-media files, wherein the multi-media type primitives include audio primitives, video primitives, animation primitives, text primitives, picture primitives, graphic primitives, and supporting material primitives*, automatically decomposing each of said multi-media type primitive components into sub-components, and automatically converting each of said sub-components into corresponding intermediate format

components. As discussed above, neither Alam nor Thum teaches automatically breaking down a multi-media input file into all of its primitives and sub-components before integrating the sub-components into an intermediate format file. For at least these reasons, the independent Claim 118 is allowable over the teachings of Alam, Thum, and any combination thereof.

The amended independent Claim 119 is directed toward a multi-media conversion and integration system comprising means for receiving one or more input multi-media content files, *means for automatically identifying multi-media type primitive components in each of said plurality of input multi-media files, wherein the multi-media type primitives include audio primitives, video primitives, animation primitives, text primitives, picture primitives, graphic primitives, and supporting material primitives,* means for automatically decomposing each of said multi-media type primitive components into sub-components, and means for automatically converting each of said sub-components into corresponding intermediate format components. As discussed above, neither Alam nor Thum teaches automatically breaking down a multi-media input file into all of its primitives and sub-components before integrating the sub-components into an intermediate format file. For at least these reasons, the independent Claim 119 is allowable over the teachings of Alam, Thum, and any combination thereof.

Hillberg teaches a method of storing a digital document to be rendered on a printer or a viewer. Although Hillberg teaches the use of communication media including wired media such as wired network or direct wired connections [Hillberg, col. 4, lines 49-53], Hillberg does not teach the breakdown of multi-media input files into all of its primitives.

Claim 114 is dependent on the independent Claim 111. As described above, the independent Claim 111 is allowable over the teachings of Alam, Thum, and any combination thereof. Accordingly, Claim 114 is also allowable as being dependent on an allowable claim. This claim adds limitations further distinguishing over the cited art.

Lickiss teaches an automated order processing system for a telecommunications services carrier. Although Lickiss teaches a PIC change fee check box which when selected indicates that the carrier customer pays the PIC fee to convert the ANI to its

CIC [Lickiss, col. 14, lines 5-10], Lickiss does not teach the breakdown of multi-media input file into all of its primitives.

Claim 115 is dependent on the independent Claim 111. As described above, the independent Claim 111 is allowable over the teachings of Alam, Thum, and any combination thereof. Accordingly, Claim 115 is also allowable as being dependent on an allowable claim. This claim adds limitations further distinguishing over the cited art.

No new subject matter has been added by way of the above amendments. For the reasons given above, the applicants respectfully submit that the Claims 111 and 114-119 are now in a condition for allowance, and allowance at an early date would be appreciated. Should the Examiner have any questions or comments, he is encouraged to call the undersigned at (650) 838-4441 to discuss the same so that any outstanding issues can be expeditiously resolved.

Respectfully submitted,
Perkins Coie LLP

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Brian R. Coleman
Reg. No. 39,145

Correspondence Address:
Customer No. 22918
Perkins Coie LLP
P.O. Box 2168
Menlo Park, California 94026
(650) 838-4300